

Guy B. Wallace, Cal. Bar No. 176151  
Christian Schreiber, Cal. Bar No. 245597  
Nancy J. Park, Cal. Bar No. 236750  
Andrew P. Lee, Cal. Bar No. 245903  
Naomi B. Sunshine, Cal. Bar No. 244094  
**SCHNEIDER WALLACE**  
**COTTRELL BRAYTON KONECKY LLP**  
180 Montgomery Street, Suite 2000  
San Francisco, CA 94104  
Telephone: (415) 421-7100  
Fax: (415) 421-7105

Susan S. Seemiller, Cal. Bar No. 150546  
BAILEY PINNEY PC  
840 Country Square Drive  
Ventura, CA 93003  
Telephone: (805) 339-9090  
Fax: (805) 339-0090

Attorneys for Plaintiffs

Cheryl D. Orr, Cal. Bar No. 143196  
Heather M. Sager, Cal. Bar No. 186566  
DRINKER, BIDDLE & REATH LLP  
50 Fremont Street, 20<sup>th</sup> Floor  
San Francisco, CA 94105-2235  
Telephone: (415) 591-7500  
Fax: (415) 591-7510

Attorneys for Defendant, RGIS LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

TRISHA WREN and CYNTHIA PIPER, et al., individually and on behalf of others similarly situated,

Case No. 3:06-cv-05778 JCS

## **STIPULATION AND [proposed] ORDER REGARDING DISCOVERY ISSUES**

## Plaintiffs,

VS.

RGIS Inventory Specialists, LLC, RGIS, LLC,  
and Does 1-25 Inclusive

## Defendants

## **STIPULATION**

On June 10, 2008, the parties met and conferred at the Northern District Court regarding several discovery issues in the above-reference matter. This Stipulation memorializes the results of that meet and confer session, as follows:

#### A. Agreements

1. Defendant previously produced header information for the electronic database files produced pursuant to this Court's April 2, 2008 Order, in which some errors were later discovered. By close of business on June 12, 2008, Defendant will amend and supplement the prior production of header information to provide accurate and complete headers for all data tables produced pursuant to the Court's April 2, 2008 Order.

2. By close of business on June 12, 2008, Defendant shall produce the original names for all files produced pursuant to the Court's April 2, 2008 Order. "Original names" means the names of the files as they are stored in Defendant's Oracle database.

3. By close of business on June 13, 2008, Defendant shall identify how to find the pre-2007 time sheet detail information within the database that has been produced to Plaintiffs and Dr. Droggin.

4. By close of business on June 13, 2008, Defendant shall produce a sample of electronic copies of the Daily Edits Audit Reports (“Edits Logs”) in native format (text) for each of California, Illinois, Oregon, and Washington.

5. By close of business on June 13, 2008, Defendant shall identify how to find the fields and files containing the categories of information in the time sheet detail reports (a sample of which is attached as Exhibit A) within the data that has been produced to Plaintiffs and Dr. Droggin.

6. Defendant shall preserve all existing and subsequently created Edits Logs from March 12, 2008 forward (the stipulation date minus the 90 days for which Defendant has been preserving such data on the Unix-based server).

#### B. Matters to be Discussed And Revisited

1. Defendant's counsel shall confer with Defendant promptly regarding whether

1 Defendant will voluntarily produce all Edits Logs in native (text) format for California, Illinois,  
2 Oregon, and Washington.

3       2. Defendant's counsel shall confer with Defendant promptly regarding whether  
4 Defendant will voluntarily produce the database file "tables.doc" which contains descriptions of  
5 the data tables and fields and some definitions of same, subject to the terms of the Stipulated  
6 Protective Order executed by the parties in this matter and, if so, the timetable for doing same.

7       3.     Defendant's counsel shall confer with Defendant promptly regarding whether  
8     Defendant will agree to make available its database experts for telephone questioning as needed by  
9     Dr. Richard Drogin with counsel present.

10       4. Defendant will provide its responses to Plaintiffs' counsel on the foregoing issues by  
11 no later than close of business on June 16, 2008.

**C. To Be Further Briefed to the Court**

13 The parties will submit letter briefs of two pages for each side regarding the following  
14 disputes:

15       1. Whether Defendant must produce in native Oracle format time record and payroll  
16 data already produced to Plaintiffs in comma-delimited format pursuant to the Court's April 2,  
17 2008 Order; and,

18       2.     Whether defendant must produce the data contained within  
19     “SCHEDULED\_START\_DATE\_TIME” in native Oracle format, as identified in the Deposition  
20     of Yvette Valdez, pp. 171-72.

21       3. The parties have stipulated to a one-week extension on the schedule on Rule 23 class  
22 certification, and will provide a proposed stipulation and order to the Court re same.

23 | SO STIPULATED, THROUGH COUNSEL OF RECORD:

24 | Dated: June 16, 2008

DRINKER, BIDDLE & REATH LLP

/s/ Cheryl D. Orr  
Cheryl D. Orr  
Attorneys for Defendant RGIS LLC

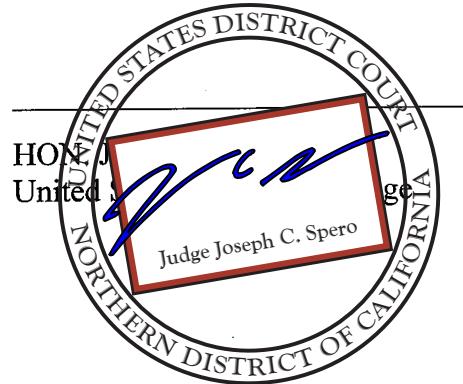
1 Dated: June 16, 2008

SCHNEIDER WALLACE  
COTTRELL BRAYTON KONECKY LLP

3 /s/Guy B Wallace  
4 Guy B. Wallace  
Attorneys for Plaintiffs

5 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

6 Dated: June 16, 2008



7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28